

USAO#2013R1285/DAW/MJW

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : HON.
 : Criminal No. 15- *cr-570(ES)*
 v. :
 : 18 U.S.C. § 2251(a)
 CLIFFORD WARES : 18 U.S.C. § 2422(b)
 : 18 U.S.C. § 2423(b)
 : 18 U.S.C. § 875(d)

INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE

(Production of Child Pornography)

On or about August 17, 2011, in the District of New Jersey,
and elsewhere, the defendant,

CLIFFORD WARES,

did knowingly employ, use, persuade, induce, entice, and coerce
and attempt to employ, use, persuade, induce, entice, and coerce
a minor female ("MINOR VICTIM 1") to engage in sexually explicit
conduct for the purpose of producing a visual depiction of such
conduct, knowing that such visual depiction would be transported
and transmitted using any means and facility of interstate
commerce, and which visual depiction was produced and
transmitted using materials that were mailed, shipped, and
transported in and affecting interstate and foreign commerce by
any means, including by computer, and attempted to do so;

In violation of Title 18, United States Code, Section 2251(a) and Section 2.

COUNT TWO

(Online Enticement of a Minor
to Engage in Criminal Sexual Conduct)

From in or about June 2011 through in or about September 2011, in the District of New Jersey, and elsewhere, the defendant,

CLIFFORD WARES,

did, using the mail and any facility and means of interstate and foreign commerce, knowingly persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce, MINOR VICTIM 1, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b) and Section 2.

COUNT THREE

(Interstate Extortionate Threat)

From in or about at least September 2011, and continuing through in or about at least October 2011, in the District of New Jersey, and elsewhere, the defendant,

CLIFFORD WARES,

with the intent to extort a thing of value from another person, namely MINOR VICTIM 1, knowingly transmitted in interstate commerce a communication containing a threat to injure the reputation or property of MINOR VICTIM 1.

In violation of Title 18, United States Code, Section 875(d).

COUNT FOUR

(Online Enticement of a Minor
to Engage in Criminal Sexual Conduct)

From in or about June 2011 through in or about August 2011,
in the District of New Jersey, and elsewhere, the defendant,

CLIFFORD WARES,

did, using the mail and any facility and means of interstate and
foreign commerce, knowingly persuade, induce, entice, and
coerce, and attempt to persuade, induce, entice, and coerce,
MINOR VICTIM 2, an individual who had not attained the age of 18
years, to engage in sexual activity for which any person can be
charged with a criminal offense.

In violation of Title 18, United States Code, Section
2422(b) and Section 2.

COUNT FIVE

(Interstate Travel to Engage in Illicit Sexual Conduct)

In or about June 2011, in the District of New Jersey, and elsewhere, the defendant,

CLIFFORD WARES,

did knowingly travel in interstate commerce for the purpose of engaging in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), that is, a sexual act with a person under the age of eighteen that would be a violation of Chapter 109A of the United States Code if the sexual act had occurred in the special maritime and territorial jurisdiction of the United States, specifically, CLIFFORD WARES, then aged 38, traveled from New York State to Passaic County, New Jersey, for the purpose of knowingly engaging in a sexual act with MINOR VICTIM 2, a person who had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 2423(b) and Section 2.

COUNT SIX

(Interstate Extortionate Threat)

From in or about at July 2011, and continuing through in or about at least August 2011, in the District of New Jersey, and elsewhere, the defendant,


CLIFFORD WARES,

with the intent to extort a thing of value from another person, namely MINOR VICTIM 2, knowingly transmitted in interstate commerce a communication containing a threat to injure the reputation or property of MINOR VICTIM 2.

In violation of Title 18, United States Code, Section 875(d).

A TRUE BILL

FOREPERSON


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 15-cr-570(ES)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

CLIFFORD WARES

INDICTMENT FOR

18 U.S.C. § 2251(a),
18 U.S.C. § 2422(b) and
18 U.S.C. § 2423(b)
18 U.S.C. § 875(d)

A True Bill.

Foreperson

PAUL J. FISHMAN

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